

1 Amy B. Vandeveld, State Bar No. 137904
LAW OFFICES OF AMY B. VANDEVELD
2 1850 Fifth Avenue, Suite 22
San Diego, CA 92101
3 Telephone: (619) 231-8883
Facsimile: (619) 231-8329

4 Attorney for Plaintiff
5
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 KAREL SPIKES

11 Plaintiff,

12 vs.

13 LOU'S AUTOMOTIVE, et al. and DOES 1
14 THROUGH 10, Inclusive,

15 Defendants.
16

Case No.: 08 CV 0657
DMS (AJB)

**JOINT MOTION TO
CONTINUE EARLY NEUTRAL
EVALUATION CONFERENCE**

ENE DATE: 6/23/08
Time: 1:30 p.m.
Judge: The Honorable
Anthony J. Battaglia

17 Plaintiff, KAREL SPIKES(hereinafter referred to as
18 "Plaintiff"), and Defendants, by and through their attorneys of
19 record, hereby stipulate and agree as follows:

20 1. The Plaintiff's attorney is scheduled to undergo foot
21 surgery on June 23, 2008, the date on which the Early Neutral
22 Evaluation is currently scheduled. Although the surgery is
23 elective, the procedure is intended to alleviate on-going and
24 significant pain. If Plaintiff's counsel is not able to undergo
25 surgery on June 23, 2008, her Health Maintenance Organization
26 does not have an another available surgery date until more than
27 two months later.

28 2. The Defendants do not object to continuing the Early

JUN-12 06 THU 03:35 PM
06/11/2008 12:22 1FAX NO.
VANDEVELD@SUP. 02
FILE

1 Neutral Evaluation date. The parties, therefore, respectfully
2 request that the Court continue the Scheduling Conference,
3 currently scheduled for June 23, 2008 to a date after July 1,
4 2008, at the Court's convenience. However, counsel for
5 Defendant LOU ARIAS is unavailable on the following dates: July
6 10 and 11, 2008 and August 4 to 12, 2008 (pre-planned vacation).

7 IT IS SO AGREED AND STIPULATED.

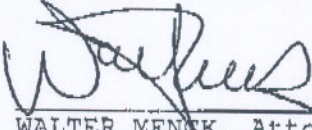
8 LAW OFFICES OF AMY B. VANDEVELD

9
10 DATED: June 11, 2008

S/AMY B. VANDEVELD
Attorney for Plaintiff
Email: abvusdc@hotmail.com

11
12 SMAHA LAW GROUP

13
14 DATED: June 11, 2008


WALTER MENCK, Attorney for
Defendant PARADISE CREEK HOLDING
CORPORATION

15
16
17 LAW OFFICES OF FRANK S. CLOWNEY
18 III

19 DATED: June 11, 2008

20 FRANK S. CLOWNEY, III, Attorney
21 for Defendant LOU ARIAS dba LOU'S
22 AUTOMOTIVE REPAIR
23
24
25
26
27
28

06/11/2008 15:38 16195570482

FRANK CLOWNEY
VANDEVELD@SUPAGE 02
PAGE 03

1 Neutral Evaluation date. The parties, therefore, respectfully
2 request that the Court continue the Scheduling Conference,
3 currently scheduled for June 23, 2008 to a date after July 1,
4 2008, at the Court's convenience. However, counsel for
5 Defendant LOU ARIAS is unavailable on the following dates: July
6 10 and 11, 2008 and August 4 to 12, 2008 (pre-planned vacation).

7 **IT IS SO AGREED AND STIPULATED.**

8 LAW OFFICES OF AMY B. VANDEVELD

9
10 DATED: June 11, 2008

S/AMY B. VANDEVELD
Attorney for Plaintiff
Email: abvusdc@hotmail.com

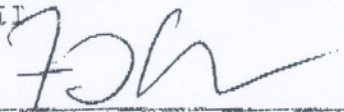
11
12 SMARA LAW GROUP

13
14 DATED: June 11, 2008

WALTER MENCK, Attorney for
Defendant PARADISE CREEK HOLDING
CORPORATION

15
16
17 LAW OFFICES OF FRANK S. CLOWNEY
III

18
19 DATED: June 11, 2008


FRANK S. CLOWNEY, III, Attorney
for Defendant LOU ARIAS dba LOU'S
AUTOMOTIVE REPAIR